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Google Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

VICKI VAN VALIN, on behalf of herself
and all others similarly situated within the
state of Oregon; NEIL MERTZ on behalf
of himself and all others similarly situated
within the state of Washington,

Plaintiffs,

v.

GOOGLE INC., a Delaware corporation,

Defendant.

No. CV 10-557 ST

**DECLARATION OF ALEXANDER
STAMOS**

I, Alexander Stamos, declare under penalty of perjury as follows:

1. I have personal knowledge of the facts set forth in this declaration and am competent to testify.

1- DECLARATION OF ALEXANDER STAMOS

LEGAL18369464.1

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2. iSEC Partners (iSEC) is an information security consulting firm headquartered in San Francisco, with offices in Seattle and New York. Our work includes software assurance, infrastructure penetration testing, code review, incident response and forensics. Our clients include Microsoft, Oracle, eBay, McKesson, Salesforce.com, Autodesk, Charles Schwab, JPMorgan Chase, ING Direct and Motorola.

3. I am a Partner and one of the founders of the company, which we started in October 2004. Before founding iSEC Partners I worked as a Managing Security Consultant with the security consultancy @stake, and I was the security lead at Loudcloud, a managed hosting provider. I have also worked for the EO Lawrence Berkeley National Laboratory. I hold a BS in Electrical Engineering and Computer Science from the University of California, Berkeley, where my studies included graduate classes in networking and computer security. I was awarded a Certified Information Systems Security Professional (CISSP) certification in 2002. I am a frequent speaker at leading security and technology conferences, such as Black Hat USA, CanSecWest, Microsoft BlueHat, the Web 2.0 Expo, CTIA, OWASP App Sec, and the Financial Services Information Sharing and Analysis Center (FS-ISAC). I have also spoken on the topic of computer forensics to private audiences at the FBI's Regional Computer Forensics Laboratory, and the Federal Reserve Banks in New York and Boston.

4. I understand that Plaintiffs in this matter seek to assure that Google does not destroy or alter any of the payload data it has collected for any person or entity within the states of Oregon and Washington. iSEC Partners was retained by Google on May 14th in connection with the handling of such data. On May 15th Google provided me with four hard drives on which Google had loaded Wi-Fi payload data for all countries from which it had collected such data. I created two new encrypted drives to store this data and recorded cryptographic hashes of the original files to guard against intentional or unintentional corruption of the data. I then destroyed the original four drives. Since then, I have placed what Google had identified as the United States data on a single encrypted hard drive and verified the hashes to insure data was not modified when copied. I then securely deleted the transferred United States data from what is now the "World except the US" drive. I have also securely stored on machines controlled by iSEC Partners the hash and file name information that prevents tampering. The encryption keys

for these drives are possessed by only myself and one other person and the hard drives are securely stored in a safe controlled by Google's physical security team.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNED at Redwood City, CA this 23rd day of May, 2010.


Alexander Stamos